

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:

**CIRCUIT CITY STORES, INC. *et. al.*,

Debtors.**

Case No. 08-35653-KRH

Chapter 11 (Jointly Administered)

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE THAT TKG Coffee Tree, L.P. ("TKG") has filed with the Court a *Motion and Supporting Memorandum of TKG Coffee Tree, L.P. for an Order Compelling Debtors to Immediately Perform Lease Obligations and Pay Administrative Rent Pursuant to 11 U.S.C. §§ 365(D)(3) and 503(B), and Granting Related Relief* (the "Motion"). A true and complete copy of the Motion has been filed with the Court and forwarded to you.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). Under Local Bankruptcy Rule 4001-(a)-1, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing unless you take the following steps:

1. File with the Court, at the address shown below, a written objection. If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before **April 7, 2009 at 5:00 p.m.**

William C. Redden, Clerk
United States Bankruptcy Court 701
E. Broad Street
Suite 4000
Richmond, VA 23219

Paul K. Campsen, Esq.
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Eugene Chang, Esq.
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14th Floor
San Francisco, CA 94111
Tele: (415) 981-0550
Fax: (415) 981-4343

Co-Counsel for TKG Coffee Tree, L.P.

You must also deliver a copy to all parties on the Certificate of Service below and to:

Counsel for Circuit City Stores, Inc.
Douglas M. Foley, Esq.
McGuireWoods LLP
9000 World Trade Center, 101 W. Main St.
Norfolk, VA 23510

Counsel for Official Committee of Unsecured Creditors
Brad R. Godshall, Esq.
Pachulski Stang Ziehl & Jones, LLP
10100 Santa Monica blvd, 11th Floor
Los Angeles, CA 90067-4100

Counsel for TKG Coffee Tree, L.P.
Paul K. Campsen, Esq.
Kaufman & Canoles
150 W. Main Street, Suite 2100
Norfolk, VA 23510

2. Attend the hearing scheduled for **April 14, 2009 at 10:00 a.m.** before the Honorable Kevin R. Huennekens, U.S. Bankruptcy Court, Room 5000, United States Courthouse, 701 E. Broad Street, Richmond, Virginia 23219.

If you or your attorneys do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing.

Dated: March 11, 2009.

TKG COFFEE TREE L.P.


By: /s/ Paul K. Campsen

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Co-Counsel for TKG Coffee Tree, L.P.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Notice of Motion and Hearing was sent on this 11th day of March, 2009, to all creditors and parties-in-interest who are included in the United States Bankruptcy Court's ECF e-mail notification system.



/s/ Paul K. Campsen